

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11  
 :  
Retrieval-Masters Creditors Bureau, Inc.,<sup>1</sup> : Case No. No. 19-23185 (RDD)  
 :  
Debtor. :  
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**FIRST OMNIBUS ORDER PURSUANT TO SECTION 365(a)  
OF THE BANKRUPTCY CODE AUTHORIZING  
REJECTION OF CERTAIN EXECUTORY CONTRACTS  
AND LEASES, AND PROVIDING RELATED RELIEF  
(SETTING BAR DATE FOR FILING CONTRACT  
REJECTION CLAIMS)**

Upon the motion (the “Motion”)<sup>2</sup> of the debtor and debtor in possession (the “Debtor”) for entry of an order authorizing rejection of certain executory contracts and leases pursuant to 11 U.S.C. § 365 and Fed. R. Bankr. P. 6006 and granting related relief; all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012, as a core proceeding pursuant to 28 U.S.C. §157(b); and venue in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found the Debtor’s notice of the Motion and opportunity for a hearing thereon were due and sufficient and that no other notice need be provided; and the Motion having complied with Fed. R. Bankr. P. 6006(f); and there being no objections to the relief granted herein; and upon the record of the hearing held

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number is 9495. As of November 1, 2019, the Debtor’s service address for purposes of this chapter 11 case is 200 Pemberwick Road, Greenwich, CT 06831. The Debtor also did business as American Medical Collection Agency.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

by the Court on the Motion on November 14, 2019 and all of the proceedings had before this Court; and the Court having determined that the legal and factual bases set forth in the Motion and at the hearing establish good and sufficient cause for the relief granted herein and that the rejection of the Contracts is a proper exercise of business judgment, it is hereby ORDERED that:

1. The Motion is granted.
2. Pursuant to sections 105(a) and 365(a) of the Bankruptcy Code, the Debtor is authorized to reject the Contracts (as identified on Exhibit “A” to this Order), and such Contracts are deemed rejected, effective as of the respective dates of rejection set forth for each such Contract on Exhibit “A” to this Order.
3. Notwithstanding the relief granted herein and any actions taken hereunder, nothing in the Motion or this Order shall: (a) constitute an admission as to the validity or priority of any claim against the Debtor, (b) constitute a waiver of the Debtor’s right to dispute any claim, or (c) prejudice any party’s right to assert that any of the Contracts are not executory or unexpired within the meaning of section 365 of the Bankruptcy Code.
4. **Any person or entity that holds a Claim arising from the rejection of Contract hereunder must submit a Proof of Claim based on such rejection by filing such Proof of Claim on the docket of this case, with a copy to the Debtor’s counsel, on or before the later of: (a) the General Claims Bar Date; and (b) thirty (30) days from the date of entry of this Order. The failure to do so by the deadlines set forth above shall preclude the receipt of any distribution from the Debtor’s estate.**
5. The terms of this Order shall be effective immediately and enforceable upon its entry.

6. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: November 21, 2019  
White Plains, New York

/s/Robert D. Drain  
THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit "A"**

**Executory Contracts and Unexpired Leases Subject to Rejection**

CONTRACTS TO REJECT

<u>VENDOR NAME</u>	<u>ADDRESS</u>	<u>EFFECTIVE DATE OF REJECTION</u>
Altice Business (f/k/a Lightpath)	1111 Stewart Avenue Bethpage, NY 11714	09/13/2019
Apex	535 Connecticut Avenue, Ste. 104 Norwalk, CT 06854	08/15/2019
Clearbrook Cross LLC	100 Clearbrook Road Elmsford, NY 10523	11/01/2019
Creditron	2265 Upper Middle Road East, Ste. 601 Oakville, Ontario, CANADA	07/01/2019
CSI International/Bi Moyle	P.O. Box 417 Williamsport, OH 43164	11/01/2019
<del>CT Corporation</del>	<del>111 Eighth Avenue, 13th Fl. New York, NY 10011</del>	<del>TBD as discussed</del>
Expertsource Global Services Private Limited	Deekay Tech Park, Unit 102 TTC Industrial Area, MIDC Turbhe, Navi Mumbai Maharashtra 40075, INDIA	06/17/2019
IBM	Carretera al Castillo 2200 El Quince El Salto, Jalisco 46680, MEXICO	11/1/2019
LexisNexis	28330 Network Place Chicago, IL 60673	07/01/2019
Nuvei Technologies	5000 Legacy Drive, Suite 320 Plano, TX 75024	06/17/2019
PCI Group, Inc.	11632 Harrisburg Road Fort Mill, SC 29707	06/17/2019
Pitney Bowes	2225 American Drive Neenah, WI 54956	09/28/2019
Protection1	800 East Waterman Wichita, KS 67202	11/01/2019
Service Express, Inc.	3854 Broadmoor Ave SE Grand Rapids, MI 49512	09/01/2019

Twilio	375 Beale Street, Ste. 300 San Francisco, CA 94105	09/10/2019
Wells Fargo Financial Services (Apple Lease)	P.O. Box 3072 Cedar Rapids IA 52406	09/09/2019
Wells Fargo Financial Services (Konica Lease)	P.O. Box 3072 Cedar Rapids IA 52406	11/01/2019
Windstream Enterprise (f/k/a Broadview Networks)	P.O. Box 70268 Philadelphia, PA 19176	08/11/2019